REMARKS

In response to the Office Action dated January 8, 2009, the Applicants have amended claims 1, 3, 8, 13, 19, 24, 26 and 27. Claims 1-28 are in the case. Reexamination and reconsideration of the application, as amended, are requested.

Claim Objections

The Office Action objected to claims 3, 8 and 19 due to minor informalities.

In response, the Applicants have amended claims 3, 8 and 19 as suggested by the Examiner to overcome these objections.

Rejections under 35 U.S.C. § 102

The Office Action rejected claims 1-2, 12-13, 23-25 and 27-28 under 35 U.S.C. § 102(b) as allegedly being anticipated by Lee et al. (U.S. Patent No. 2003/193593).

The Applicants respectfully traverse this rejection and contend that all of the elements of the Applicant's independent claims are not disclosed by Lee et al.

Specifically, the Applicants' newly amended independent claims now include organizing the entire set of pixels into dynamic and static partitions, each partition having multiple pixels, mapping one or more of the partitions one or more of the member-pixels of the subset, respectively and reading the static partitions once and the dynamic partitions multiple times and processing extra partition-read requests for creating a series of images corresponding in time to more frequently read partitions.

In contrast, Lee et al. is missing the above **newly** added features as specifically claimed. For example, unlike the Applicants' independent claims where the entire set of pixels are organized into dynamic and static partitions, **mapping** the partitions to member-pixels of the subset, reading the static partitions once and the dynamic partitions multiple times and processing extra partition-read requests for creating a series of images corresponding in time to more frequently read partitions, Lee et al. simply disclose using X-Y addressable active pixel sensors. Consequently, because Lee et al. does **not** disclose all of the features of the Applicants' independent claims, Lee et al. cannot anticipate the claims.

Rejections under 35 U.S.C. § 103

The Office Action rejected claims 3-9, 14-20 and 26 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lee et al. in view of Yoneyama (JP 04313949 A). The Office Action rejected claims 10-11 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lee et al. in view of Horie et al. (U.S. Patent No. 6,480,624). The Office Action rejected claims 21-22 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lee et al. in view of Yoneyama and further in view of Horie et al.

The Applicants respectfully traverse these rejections and contend that all of the elements of the Applicants' independent claims are not disclosed, taught or suggested by any combination of Lee et al. in view of Yoneyama and/or Horie et al.

Namely, although Yoneyama disclose V_A, V_B and V_C of picture elements A, B and C (the Examiner related this to organizing the entire set of pixels and mapping the partitions), clearly, Yoneyama and/or Horie do **not** add the features that are missing from Lee et al. For instance, the combined cited references still fail to disclose, teach or suggest the Applicants' claimed organizing the entire set of pixels into dynamic and static partitions, each partition having multiple pixels, mapping one or more of the partitions one or more of the member-pixels of the subset, respectively, **reading the static partitions once and the dynamic partitions multiple times** and processing extra partition-read requests for creating a series of images corresponding in time to more frequently read partitions.

Hence, because the combined cited references do **not** disclose, teach or suggest all of the features of the independent claims, the Applicants submit that the obviousness rejections should be withdrawn.

With regard to the dependent claims, since they depend from the above-argued respective independent claims, they are therefore patentable on the same basis. (MPEP § 2143.03).

Thus, it is respectfully requested that all of the claims be allowed based on the amendments and arguments. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue.

Additionally, in an effort to further the prosecution of the subject application, the Applicant kindly **request** the Examiner to telephone the Applicant's attorney at **(818) 885-1575**. Please note that all mail correspondence should continue to be directed to: Please note that all correspondence should continue to be directed to:

Hewlett Packard Company
Intellectual Property Administration
P.O. Box 272400
Fort Collins, CO 80527-2400

Respectfully submitted,
Dated: April 2, 2009

/Edmond A. DeFrank/
Edmond A. DeFrank
Reg. No. 37,814
Attorney for Applicant
(818) 885-1575 TEL
(818) 885-5750 FAX